

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ROCKWELL AUTOMATION
TECHNOLOGIES, INC.,

Plaintiff,

v.

SECURE CROSSING RESEARCH
AND DEVELOPMENT INC.,

Defendant.

Case No. 2:12-cv-10274-GCS-MKM

Honorable George Caram Steeh

DECLARATION OF LEE A. LANE

I, Lee A. Lane, declare as follows:

1. I am an employee of Rockwell Automation, Inc., the parent company of Rockwell Automation Technologies, Inc. (collectively "Rockwell Automation"), and my job title is Business Director, Controllers. My business address is: 1 Allen-Bradley Drive, Mayfield Heights, Ohio 44124. I have personal knowledge of the contents of this declaration.

2. Rockwell Automation is in the process of developing a product embodying the invention covered by U.S. Patent No. 7,990,967, which relates to the filtering of industrial protocols. Upon release, it is expected to compete with Secure Crossing's Zenwall product line sold by Secure Crossing Research & Development, Inc.

I declare under the penalty of perjury under the law of the United States that the foregoing is true and correct.

Executed this 20th day of June at Mayfield Heights, Ohio.



Lee A. Lane